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The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE WASHINGTON MUTUAL, INC. SECURITIES & ERISA LITIGATION

No. 2:08-md-1919 MJP

IN RE WASHINGTON MUTUAL, INC. SECURITIES LITIGATION

This Document Relates to: ALL CASES

Lead Case No. C08-387 MJP

REPLY DECLARATION OF HANNAH ROSS IN FURTHER SUPPORT OF LEAD PLAINTIFF'S MOTIONS FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENTS AND APPROVAL OF PLAN OF ALLOCATION AND LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

I, HANNAH ROSS, under the penalty of perjury, declare as follows:

- 1. I am a partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP ("BLB&G" or "Lead Counsel"). I submit this reply declaration in further support of Lead Plaintiff's motions for final approval of the proposed Settlements and approval of the Plan of Allocation, and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Angela L. Marsteiner to the Clerk's Office of the United States District Court for the Western District of Washington, Ronald L. Berenstain, Esq. of Perkins Coie LLP, and myself, dated September 29, 2011. The version of this letter that is attached is the redacted copy that was filed on the Court's docket on October 21, 2011 (ECF No. 896).

- 3. Attached hereto as Exhibit 2 are true and correct copies of letters from James Newman to the United States District Court for the Western District of Washingon, dated October 6, 2011 (ECF No. 892) and October 17, 2011 (ECF No. 895).
- 4. Attached hereto as Exhibit 3 are true and correct copies of (a) a letter from Annette L. Lynes-Meeks, dated September 14 and 15, 2011, that was forwarded to Lead Counsel by Perkins Coie LLP, and (b) a letter from Rochelle Feder Hansen of BLB&G to Ms. Lynes-Meeks, dated October 18, 2011. In the interest of Ms. Lynes-Meeks's privacy, social security numbers, account numbers, residential street addresses and telephone numbers have been redacted from Exhibit 3.
- 5. Attached hereto as Exhibit 4 is a true and correct copy of an email from Eric Jann to the Court, dated October 16, 2011 (ECF No. 894).
- 6. Attached hereto as Exhibit 5 are true and correct copies of (a) a letter from Raffaele Fazio, Deputy General Counsel of Koch Companies Public Sector, LLC, to In re Washington Mutual, Inc. Securities Litigation EXCLUSIONS, c/o The Garden City Group, Inc., dated September 8, 2011, and (b) a letter from Rochelle Feder Hansen of BLB&G to Mr. Fazio, dated October 19, 2011.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 28th day of October, 2011, in New York, New York.

Hannah Ross

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CERTIFICATE OF SERVICE 1 I hereby certify that on October 28, 2011, I electronically filed the foregoing and all of its 2 attachments with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses on the Court's Electronic Mail Notice list. Additionally, 3 the foregoing and all of its attachments were served by first-class mail on October 28, 2011 on 4 the following: 5 Ms. Angela L. Marsteiner Mr. James Newman 49 Park Avenue 83910 Charro Dr. Hawthorne, NJ 07506 6 Indio, CA 92203 7 Ms. Annette Lynes-Meeks 703 Broadmoor Dr. Mountain Home, AR 72653 8 9 And via e-mail on October 28, 2011 on Eric Jann at ericjann@comcast.net. 10 BERNSTEIN LITOWITZ BERGER & **GROSSMANN LLP** 11 12 By: /s/ Hannah Ross Hannah Ross (pro hac vice) 13 Katherine M. Sinderson (pro hac vice) 1285 Avenue of the Americas 14 New York, New York 10019 (212) 554-1400 15 (212) 554-1444 Fax: 16 Email: hannah@blbglaw.com katherine@blbglaw.com 17 Counsel for Lead Plaintiff 18 Ontario Teachers' Pension Plan Board and Lead Counsel for the Class 19 BYRNES KELLER & CROMWELL LLP 20 Bradley S. Keller, WSBA# 10665 21 Jofrey M. McWilliam, WSBA# 28441 1000 Second Avenue, Suite 3800 22 Seattle, Washington 98104 Tel: (206) 622-2000 23 Fax: (206) 622-2522 Email: bkeller@byrneskeller.com 24 jmcwilliam@byrneskeller.com 25 Liaison Counsel for the Class 26

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